

## **EXHIBIT A**

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT A - INSUFFICIENT DOCUMENTATION CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	AGILENT TECHNOLOGIES C/O SIERRA CAPITAL 2699 WHITE RD STE 255 IRVINE CA 92614	01-01139	777 W.R. GRACE & CO.	\$1,967.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
2	ALBURY, RICKY M PO BOX AB20480 MARSH HARBOUR ABACO BAHAMAS	01-01139	2512 W.R. GRACE & CO.	\$6,000,000.00	(P)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
3	AMERICAN HARDWARE CTR INC 2746 EVANS MILL RD LITHONIA GA 30058	01-01139	1179 W.R. GRACE & CO.	\$365.72	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
4	AMERICAN TRANSPORTATION GROUP AGENT FOR COMPANIA SUD-AMERICANA DE SAPORES ATTN JESUS PAGAN 99 WOOD AVE S 9TH FL ISELIN NJ 08830	01-01140	118 W.R. GRACE & CO.- CONN.	\$4,100.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
5	APV D&B RMS BANKRUPTCY SERVICES PO BOX 5126 TIMONIUM MD 21094	01-01139	296 W.R. GRACE & CO.	\$652.39	(A)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
6	BERNARD, VIRGIE 1122 SO ORANGE LAFAYETTE LA 70581	01-01139	2608 W.R. GRACE & CO.	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
7	BERRY & BERRY C/O C RANDALL BUYP ESQ PLASTIRAS & TERRIZZI 24 PROFESSIONAL CENTER PKWY STE 150 SAN RAFAEL CA 94903	01-01139	1325 W.R. GRACE & CO.	\$233,540.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
8	CAPITAL ONE ATTN: PAM M SCHARNHORST PO BOX 85015 RICHMOND VA 23285-5015	01-01139	1307 W.R. GRACE & CO.	\$580.83	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
9	CEMEX INC 3820 NORTHDAL BLVD #100B TAMPA FL 33624-1860	01-01139	2003 W.R. GRACE & CO.	\$1,040.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.

\*Plus, In certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT A - INSUFFICIENT DOCUMENTATION CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
10 CIFELLI, ALBERT S 15 HUTCHINSON ST LOWELL MA 01851	01-01139	2291 W.R. GRACE & CO.	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
11 CINCINNATI BELL TELEPHONE COMPANY 201 E FOURTH ST CINCINNATI OH 45202	01-01139	3239 W.R. GRACE & CO.	\$965.67	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
12 COLUMBIA GAS OF OHIO INC 200 CIVIC CENTER DR 8TH FL COLUMBUS OH 43215	01-01140	102 W.R. GRACE & CO.- CONN.	\$2,679.16	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
13 COMMISSIONERS OF PUBLIC WORKS PO BOX B CHARLESTON SC 29402	01-01140	578 W.R. GRACE & CO.- CONN.	\$399.54	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
14 COMPUTER TASK GROUP INC C/O SIERRA CAPITAL 2699 WHITE RD STE 255 IRVINE CA 92614	01-01139	649 W.R. GRACE & CO.	\$4,380.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
15 CONECTIV POWER DELIVERY REVENUE MANAGEMENT 5 COLLINS DRIVE #2076 CARNEYS POINT NJ 08069	01-01140	105 W.R. GRACE & CO.- CONN.	\$2,144.82	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
16 DARKS, TYRONE P ID #239667 PO BOX 97 MCALESTER OK 74502	01-01139	1474 W.R. GRACE & CO.	\$25,000,000.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
17 DUN & BRADSTREET C/O D&B BANKRUPTCY SERVICES PO BOX 5126 TIMONIUM MD 21094	01-01140	209 W.R. GRACE & CO.- CONN.	\$88,987.50	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
18 FARIAS / FARIAS 8406 EL GATO RD LAREDO TX 78045	01-01139	1919 W.R. GRACE & CO.	\$340.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
19 GRAFCOR PAKAGING INC 121 LOOMIS ST ROCKFORD IL 61101	01-01139	944 W.R. GRACE & CO.	\$680.22	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
20 GRAY, KEVIN L 57951 CASTRO ST PLAQUEMINE LA 70764-4305	01-01139	2596 W.R. GRACE & CO.	UNKNOWN \$500,000.00	(P) (U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT A - INSUFFICIENT DOCUMENTATION CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
21	GRAY, KEVIN L 57951 CASTRO ST PLAQUEMINE LA 70764	01-01140	2597 W.R. GRACE & CO.- CONN.	\$500,000.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
22	HOLMES, LONNIE 9416 BURNSIDE CHICAGO IL 60619	01-01139	2514 W.R. GRACE & CO.	UNKNOWN	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
23	IRON MOUNTAIN RECORDS MANAGEMENT C/O D&B BANKRUPTCY SERVICES PO BOX 5126 TIMONIUM MD 21094	01-01139	339 W.R. GRACE & CO.	\$7,026.79	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
24	KONICA BUSINESS TECHNOLOGIES TRACY HYSLER 500 DAY HILL RD WINDSOR CT 06095	01-01139	2035 W.R. GRACE & CO.	\$2,598.77	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
25	MARTEN BROWN INC 1191 2ND AVE STE 2200 SEATTLE WA 98101	01-01139	784 W.R. GRACE & CO.	\$1,500.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
26	MATTHEWS ELECTIC SUPPLY CO C/O SIROTE & PERMUTT PC ATTN COLLECTION DEPT PO BOX 55727 BIRMINGHAM AL 35255-5727	01-01140	272 W.R. GRACE & CO.- CONN.	\$910.96	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
27	MAYES, ROGER L 14 GINGHAM CT MAULDIN SC 29662	01-01139	7355 W.R. GRACE & CO.	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
28	METHODIST HOSPITAL MARIAN C GRICE 1265 UNION AVE MEMPHIS TN 38104	01-01140	1092 W.R. GRACE & CO.- CONN.	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
29	MICRO WAREHOUSE 1690 OAK ST LAKEWOOD NJ 08701	01-01139	1653 W.R. GRACE & CO.	\$255.63	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
30	NATIONAL GYPSUM COMPANY 2001 REXFORD RD CHARLOTTE NC 28211	01-01139	3308 W.R. GRACE & CO.	\$3,228.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
31	OFFICE DEPOT INC ROBBIE SMITH ACCS 2200 OLD GERMANTOWN RD DELRAY BEACH FL 33445	01-01139	444 W.R. GRACE & CO.	\$5,282.77	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT A - INSUFFICIENT DOCUMENTATION CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
32 OFFICE TEAM DIV OF ROBERT HALF INTERNATIONAL ATTN MICHELE CABRAL 5720 STONERIDGE DR STE 3 PLEASANTON CA 94588-2700	01-01139	99 W.R. GRACE & CO.	\$695.72	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
33 PALAZZO, RAPHEAL J C/O DONOVAN CORRECTIONAL FAC FAC 17-131-U 480 ALTA RD SAN DIEGO CA 92119	01-01139	2661 W.R. GRACE & CO.	\$12,000.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
34 RANDSTAD NORTH AMERICA ATTN: KERRI GOBER 2015 SOUTHPARK PLACE ATLANTA GA 30339	01-01139	657 W.R. GRACE & CO.	\$4,300.04	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
35 RIGELTON JR, MACK	01-01139	2829 W.R. GRACE & CO.	\$1,000,000.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
36 RIGELTON REV, D M PO BOX 5742 NEW ORLEANS LA 70157-0432	01-01139	2677 W.R. GRACE & CO.	\$1,000,000.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
37 SANDERS ROOFING CO INC C/O SIERRA CAPITAL 2699 WHITE RD STE 255 IRVINE CA 92614	01-01139	639 W.R. GRACE & CO.	\$3,384.90	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
38 SERVICE FILTRATION CORPORATION 2900 MACARTHUR BLVD NORTHBROOK IL 60062-2005	01-01139	2822 W.R. GRACE & CO.	\$535.38	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
39 SFI OF DELAWARE LLC 225 W OLNEY RD NORFOLK VA 23510	01-01140	1392 W.R. GRACE & CO.- CONN.	\$2,260.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
40 SPEEDWAY SUPERAMERICA LLC CREDIT CARD CTR PO BOX 1590 SPRINGFIELD OH 45501-1590	01-01140	159 W.R. GRACE & CO.- CONN.	\$4,596.16	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
41 SPEEDWAY SUPERAMERICA LLC CREDIT CARD CTR PO BOX 1590 SPRINGFIELD OH 45501-1590	01-01139	160 W.R. GRACE & CO.	\$4,380.82	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT A - INSUFFICIENT DOCUMENTATION CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
42 TEXAS COMMISSION ON ENVIRONMENTAL QUALITY OFFICE OF THE ATTORNEY GENERAL BANKRUPTCY & COLLECTIONS PO BOX 12548 AUSTIN TX 78711-2548	01-01139	5302	\$812,417.41	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.				
43 THE OLD LINE LIFE INSURANCE C/O ROBERT E PIERCE 2437 S LOTUS AVE FRESNO CA 93706	01-01140	1066	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.- CONN.				
44 THE SHERWIN WILLIAMS COMPANY ATTN: JOHN M YARO 101 PROSPECT AVE NW CLEVELAND OH 44115	01-01139	321	UNKNOWN	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.				
45 UNIFIRST CORP 68 JONSPIN RD WILMINGTON MA 01887	01-01139	4817	\$291.65	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.				
46 USX ENGINEERS AND CONSULTANTS INC 4000 TECHNICAL DR ATTN GARY R STADELMAN MONROEVILLE PA 15146	01-01139	2127	\$1,020.00	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.				
47 WEST GROUP THOMAS J LALLIER FOLEY & MANSFIELD PLLP 1108 NICOLLET MALL #200 MINNEAPOLIS MN 55403	01-01140	342	\$1,188.55	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.- CONN.				
48 WILLOW TREE APTS 1802 ROBINSON RD GRAND PRAIRIE TX 75051-3895	01-01139	1914	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
	W.R. GRACE & CO.				

<b>totals:</b>	\$652.39	(A)
	\$6,000,000.00	(P)
	\$29,210,044.01	(U)

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

## **EXHIBIT B**

**In re: W.R. GRACE & CO., et al**  
**OMNIBUS 11: EXHIBIT B - NO SUPPORTING DOCUMENTATION CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	BARNETT, MARK C 116 DRUID ST GREENVILLE SC 29609-4802	01-01139	2107 W.R. GRACE & CO.	\$4,637.56	(P)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
2	CROSBY, ANNIE 624 ECHO CAVE LN CHARLOTTE NC 28217	01-01140	15447 W.R. GRACE & CO.- CONN.	UNKNOWN	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
3	RIVAS, MARIA L PO BOX 658 LA BLANCA TX 78558	01-01139	15373 W.R. GRACE & CO.	BLANK	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.
4	VINSON & ELKINS LLP ATTN: LYDIA PROTOPAPAS 2300 FIRST CITY TOWER 1001 FANNIN HOUSTON TX 77002-6760	01-01139	451 W.R. GRACE & CO.	\$1,636.89	(U)	NOTICE OF INTENT TO OBJECT SENT. NO RESPONSE RECEIVED.

<b>totals:</b>	\$4,637.56	(P)
	\$1,636.89	(U)

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\***(A)** - Administrative  
**(P)** - Priority

**(S)** - Secured  
**(U)** - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.



## **EXHIBIT C**

All responses are to be served upon: Rachel R. Schulman, Kirkland & Ellis LLP 200 East Randolph Drive, Chicago, Illinois 60601 and David W. Carickhoff, Jr. Pachulski, Stang, Ziehl, Young, Jones & Weintraub, P.C. 919 North Market Street 16th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> )  
)  
Debtors. ) Case No. 01-01139 (JKF)  
)  
) (Jointly Administered)

Hearing Date: June 27, 2005 at 12:00 p.m.  
Responses Due: June 17, 2005 at 4:00 p.m.

•02112236510671•

02112236510671

ALAMEDA COUNTY TAX COLLECTOR  
ATTN: JOHN LAC  
1221 OAK STREET  
OAKLAND, CA 94612

Basis For Objection:  
NO LIABILITY

Reason for Proposed Disallowance:  
CLAIM AMOUNT BASED ON ESTIMATE.

Claim Data				Total	Claim
Case	Claim Number	Claim Date	Claim Dollars*	Class**	
01-01140	152	6/12/2001	\$0.00	(P)	

**OMNIBUS 11: EXHIBIT C - SAMPLE CUSTOM NOTICE**

**NOTICE OF FILING DEBTORS' ELEVENTH  
OMNIBUS OBJECTION TO CLAIMS (NON-ASBESTOS GATEWAY)**

PLEASE TAKE NOTICE that on or about May 18, 2005, the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Eleventh Omnibus Objection to Claims (Non-Asbestos Gateway) (the "Non-Asbestos Gateway Omnibus Objection") with the United States Bankruptcy Court for the District of Delaware.

<sup>1</sup> The Debtors consist of the following 62 entities: W.R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W.R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W.R. Grace Capital Corporation, W.R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**PLEASE TAKE FURTHER NOTICE** that the following parties will receive a copy of the Non-Asbestos Gateway Omnibus Objection (with all exhibits): (i) the U.S. Trustee and (ii) the Core Group as defined in the current Case Management Procedures and (iii) the 2002 List. In addition, the Debtors' claims consultant, Bankruptcy Management Corporation ("BMC"), will serve a copy of the Non-Asbestos Gateway Omnibus Objection and a customized Notice summarizing claim detail exactly as reflected in the Exhibit on which such creditor is listed upon those creditors that have filed claims that are affected by the Non-Asbestos Gateway Omnibus Objection in lieu of serving all Exhibits. Any party may obtain a copy of the Non-Asbestos Gateway Omnibus Objection with all Exhibits or a copy of the Debtors' Declaration in Support of the Objection by requesting the same from BMC at (888) 909-0100 or by going onto the BMC website at <http://www.bmccorp.net/wrgrace>.

**PLEASE TAKE FURTHER NOTICE that**

1. A hearing on the Non-Asbestos Gateway Omnibus Objection will be held before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware on **June 27, 2005 at 12:00 p.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Non-Asbestos Gateway Omnibus Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, 824 Market Street, Wilmington, Delaware 19801, and serve a copy of the response upon Kirkland & Ellis LLP, Attn: Rachel R. Schulman, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and upon Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C., Attn: David W. Carickhoff, Jr., 919 N. Market Street, 16th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), so as to be received on or before **June 17, 2005 at 4:00 p.m. (Eastern Time)**. Only those responses timely filed with the Court and received by the Debtors' counsel will be considered by the Court.

3. If no response is filed, served and received by June 17, 2005, at 4:00 p.m. (Eastern Time) the Court will be requested to enter an order, similar to the attached form of proposed order disallowing, expunging, and/or reclassifying the Claim(s) as requested in the Non-Asbestos Gateway Omnibus Objection.

4. Any response should contain the following:

- (i) a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of the Objection to which the response is directed;
- (ii) the name and contact information (including daytime telephone number) of the claimant and a description of the basis for the amount of the claim;
- (iii) the claim number(s) of the claim objection(s) to which the response is directed;
- (iv) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Non-Asbestos Gateway Omnibus Objection; and
- (v) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim.

5. If you file a response to the Non-Asbestos Gateway Omnibus Objection, you should be prepared to argue that response at the Claims Hearing unless you reach an agreement with the Debtors' counsel to continue or resolve your matter.

6. You need not respond to the Non-Asbestos Gateway Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Non-Asbestos Gateway Omnibus Objection. If you do not timely file and serve a response to the Non-Asbestos Gateway Omnibus Objection, the relief requested in the Non-Asbestos Gateway Omnibus Objection may be granted without further notice to you. Failure to timely file a response to the Non-Asbestos Gateway Omnibus Objection shall be deemed (i) waiver of your right to respond to the Non-Asbestos Gateway Omnibus Objection and (ii) your consent to the relief requested in the Non-Asbestos Gateway Omnibus Objection respecting your Claim.

The Debtors reserve the right to file and serve a reply to a claimant's Response. **If you have any questions regarding your claim(s) you should contact Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Ninth Omnibus Objection, please call Rachel Schulman at Kirkland & Ellis LLP at (312) 861-2441.**

Wilmington, Delaware  
Dated: May 18, 2005

Respectfully submitted,

KIRKLAND & ELLIS LLP  
James H.M. Sprayregen, P.C.  
James W. Kapp III  
Janet S. Baer  
200 East Randolph Drive  
Chicago, IL 60601-6636  
(312) 861-2000 (telephone)  
(312) 861-2200 (facsimile)

and

PACHULSKI, STANG, ZIEHL, YOUNG,  
JONES & WEINTRAUB P.C.

/s/

Laura Davis Jones (Bar No. 2436)  
David W. Carickhoff, Jr. (Bar No. 3715)  
919 N. Market Street, 16<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
(302) 652-4100 (telephone)  
(302) 652-4400 (facsimile)

Co-Counsel for the Debtors and Debtors in Possession